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Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MICHAEL J. FLYNN, and PHILIP
STILLMAN,

Plaintiffs,

v.

MICHAEL E. LOVE, an individual;
JACQUELINE LOVE, an individual;
MICHAEL E. LOVE as TRUSTEE OF THE
MICHAEL LOVE FAMILY TRUST;
MELECO, INC., a Nevada corporation; and
DOES 1-10

Defendants.

Case No.: 3:19-cv-239-MMD-CLB

**STIPULATION AND PROPOSED ORDER
TO ALLOW PLAINTIFFS TO FILE A
THIRD AMENDED COMPLAINT AND TO
SET RESPONSE DEADLINE**

Plaintiffs Michael J. Flynn and Philip Stillman (“Plaintiffs”), appearing *pro se*, and
Defendants Michael Love, individually and as trustee of the Michael Love Family Trust,
Jacquelyne Love¹, and Meleco, Inc. (collectively, “Defendants”) by and through their attorneys of

¹ Incorrectly sued as “Jacqueline” Love.

record, the law firm Greenberg Traurig, LLP, hereby stipulate and request that Plaintiffs be permitted to file the Proposed Third Amended Complaint attached hereto as Exhibit A within three (3) business days of the Court's entry of this stipulation and order. In so stipulating, Defendants expressly reserve all available rights, remedies, and defenses to all claims and allegations set forth in Plaintiffs' Proposed Third Amended Complaint, whether at law, in equity, pursuant the Federal Rules of Civil Procedure, or from any other source. The parties further stipulate and request that Defendants have thirty (30) days from the date upon which Plaintiffs file the Proposed Third Amended Complaint by which to file their Answer or other response.

IT IS SO STIPULATED.

DATED this 30th day of June 2020.

DATED this 30th day of June 2020.

GREENBERG TRAURIG, LLP

/s/ Philip Stillman

MICHAEL J. FLYNN, ESQ.

Appearing Pro Se

PHILIP STILLMAN, ESQ.

Appearing Pro Se

Plaintiffs

/s/ Jason K. Hicks

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VINCENT H. CHIEFFO

Admitted Pro Hac Vice

Attorneys for Defendants

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated this 1st day of July 2020.